

**ALASKA BOARD OF FISHERIES AND ALASKA BOARD OF GAME  
REGULATION PROPOSAL FORM  
PO BOX 115526, JUNEAU, ALASKA 99811-5526**

**(Please note that this proposal is for the February 14-23, 2014 Region III meeting)**

<p><b>BOARD OF FISHERIES REGULATIONS</b></p> <p><input type="checkbox"/> Fishing Area</p> <p><input type="checkbox"/> Subsistence                      <input type="checkbox"/> Personal Use</p> <p><input type="checkbox"/> Sport                                      <input type="checkbox"/> Commercial</p> <p><b>JOINT BOARD REGULATIONS</b></p> <p><input type="checkbox"/> Advisory Committee    <input type="checkbox"/> Regional Council            <input type="checkbox"/> Rural</p>	<p><b>BOARD OF GAME REGULATIONS</b></p> <p><b>Game Management Unit (GMU)</b>    <u>Region III</u></p> <p><input checked="" type="checkbox"/> Hunting                      <input type="checkbox"/> Trapping</p> <p><input type="checkbox"/> Subsistence                <input type="checkbox"/> Other _____</p> <p>Resident</p> <p><input checked="" type="checkbox"/> Nonresident</p>
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**Please answer all questions to the best of your ability. All answers will be printed in the proposal packets along with the proposer's name (address and phone numbers will not be published). Use separate forms for each proposal.**

**1. Alaska Administrative Code Number 5 AAC**    85.055 and 5AAC 92.057                      **Regulation Book Page No.**    \_\_\_\_\_

**2. What is the problem you would like the Board to address?**

**Unlimited Nonresident Sheep Hunting Opportunities and Unlimited Guide Numbers in parts of Region III**

In many parts of Region III (excluding USFWS and NPS lands) where we have open general season sheep hunts, there are no limits on the number of nonresident hunters or the guides they are required to hire to hunt sheep. Because nonresident guided hunters have such a higher success rate than resident hunters, this has led to concerns of localized diminished populations and future restrictions on resident general open season sheep hunting opportunities. Some areas are also experiencing crowding, conflicts between guides and resident hunters and conflicts between guides licensed for the same area.

Our primary concerns are sheep conservation and continued resident general season sheep hunting opportunities. We firmly believe that we can't allow any areas to have nearly every full-curl ram harvested each season, which is what we fear may happen in some areas if we continue to allow unlimited guiding and nonresident sheep hunting opportunities. We also believe, just on a matter of fairness to Alaskan resident sheep hunters, that non-resident sheep harvest rates of 40% across much of Region III, and 50-80% in some subunits, is unacceptable.

For example, below are the 2011 statistics for two subunits (2012 data not yet available):

	10	16.7% <i>16.7% of all overlays</i>	50	83.3% <i>83.3% of all overlays</i>	0	0%	60	100%
	66	82.5% <i>82.5% of all overlays</i>	14	17.5% <i>17.5% of all overlays</i>	0	0%	80	100%
	2	100% <i>100% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	2	100%

	3	100% <i>100% of all tickets</i>	0	0% <i>0% of all tickets</i>	0	0%	3	100%

For subunit 19C, there were 80 nonresident guided hunters and 60 resident hunters who hunted dall sheep in 2011. Guided nonresident hunters took 66 of 81 total sheep, **resulting in 81% of the total overall harvest.**

### Interim Reports GS000 Sheep - Year 2011 Unit 20A

#### Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
<b>Residents</b>	40	25.2% <i>25.2% of all overlays</i>	119	74.8% <i>74.8% of all overlays</i>	0	0%	159	100%
<b>Non Res</b>	62	72.1% <i>72.1% of all overlays</i>	24	27.9% <i>27.9% of all overlays</i>	0	0%	86	100%
<b>Unspecified</b>	1	16.7% <i>16.7% of all overlays</i>	5	83.3% <i>83.3% of all overlays</i>	0	0%	6	100%
<b>No Overlay</b>	1	100% <i>100% of all tickets</i>	0	0% <i>0% of all tickets</i>	0	0%	1	100%
<b>Total</b>	<b>104</b>	<b>41.3%</b>	<b>148</b>	<b>58.7%</b>	<b>0</b>	<b>0%</b>	<b>252</b>	<b>100%</b>

For Unit 20A, a subunit known to have the type of crowding and conflicts described in this proposal, in 2011 there were 86 nonresident guided sheep hunters and 159 resident hunters. Guided nonresident sheep hunters took 62 of 104 total sheep, resulting in 60% of the total harvest. (Note that even though resident sheep hunters were nearly double the nonresidents, guided nonresident hunters still took 60% of the sheep)

While we certainly support and respect the guiding profession and encourage nonresident hunting and want to share our wildlife resources with our nonresident hunting brethren, we believe there needs to be new limits applied to nonresident sheep hunting opportunity.

This proposal is similar to the one we put before the Board in 2012, and at that time the Board expressed great displeasure when the Department presented data on the high nonresident sheep harvest rates in some subunits, like those above. The Board is well aware of these ongoing problems, but has put off acting on them using the rationale that the proposed DNR Guide Concession Program that would limit guides (and thus their nonresident clients) would be implemented on state and BLM lands. But as of this writing, the proposed DNR Guide Concession Program has not been funded and has been declared "dead" by DNR sources. Even if it were to be revived and be implemented, the earliest implementation keeps getting pushed farther and farther down the line on the calendar.

With all due respect to the Board, we feel strongly it is well past time to act now in ways that will better conserve our sheep populations, prevent the loss of resident general open season sheep hunting opportunities, and curb the ongoing conflicts that surround nonresident guided sheep hunting in much of Region III.

**3. What will happen if this problem is not solved?**

Continued localized diminished populations of full-curl rams that threaten population sustainability and resident general open season sheep hunting opportunities, continued user conflicts and crowding, and continued inequitable nonresident sheep harvest rates of 40% annually in much of Region III, and 50-80% in some subunits.

**4. What solution do you prefer? In other words, if the Board adopted your solution, what would the new regulation say?**

All nonresident sheep hunts in Region III where we have general open season hunts for nonresidents (excluding subunits within USFWS and NPS lands) become draw only, and the total number of permits is capped based on sheep density and population estimates and/or recent historical sheep harvest data for each subunit, to try to achieve a balance whereby nonresident guided sheep hunter harvest rates are lowered, more full curl rams are left on the mountain, and the conflicts afield greatly reduced.

(If the Board prefers, this regulation if passed could have a sunset clause added should the proposed DNR Guide Concession Program ever be implemented.)

We recognize that not all areas in Region III are experiencing the problems outlined in this proposal. However, if the Board only works to "fix" the problem areas, that presents the real possibility that some guides will shift to areas still open to general season nonresident sheep hunting, where the same type of problems will occur.

There are various ways the Board could decide permit allocation levels. One way would be to look at the sheep harvest statistics for federal lands where the federal guide concession program is in place. It has been widely promoted that the proposed DNR Guide Concession Program the Board favors as a solution to these issues was supposed to mirror or be similar to the federal concession program. Just using the Arctic National Wildlife Refuge as an example, nonresident sheep harvest rates have tended to average between 25-30%. Below are the statistics from 2011 for subunits 26B and 26C within the Refuge:

**Interim Reports GS000 Sheep - Year 2011 Unit 26B,26C**

**Current File Statistics (110)**

	95	36.8%	163	63.2%	0	0%	258	100%
	37	72.5%	14	27.5%	0	0%	51	100%
	7	41.2%	10	58.8%	0	0%	17	100%
	0	0%	1	100%	0	0%	1	100%
		<i>0% of all tickets</i>		<i>100% of all tickets</i>				

	0	0% 0% of all tickets	1	100% 100% of all tickets	0	0%	1	100%

Nonresident guided hunters took 37 of 139 total sheep for a 27% harvest rate. Nonresident guided hunters comprised 15% of the total hunters.

**5. Does your proposal address improving the quality of the resource harvested or products produced? If so, how?**  
 Yes. By limiting nonresident sheep hunting opportunities in much of Region III we thus limit the number of guides they must hire, thereby reducing total sheep harvests, better conserving sheep populations, as well as improving the quality of sheep hunts for both guided and unguided hunters by reducing crowding and conflicts afield.

**6. Solutions to difficult problems benefit some people and hurt others:**

**A. Who is likely to benefit if your solution is adopted?**  
 All those who put the resource first and wish to see our Region III sheep populations conserved and sustained. All resident hunters who want to see their general open season sheep hunting opportunities retained, and their success rates go up. All guided nonresident hunters who don't want to compete with so many other guided hunters and who favor a more quality sheep hunt.

**B. Who is likely to suffer if your solution is adopted?**  
 Some guides would suffer monetarily because of the lower number of nonresident clients. Division of Wildlife Conservation funding would decrease because of a decrease in nonresident sheep tags being sold, and some local economies could see a decrease in nonresident hunting-related tourism, but it's important to emphasize that these same things would happen if the DNR proposed Guide Concession Program, which the Board supports, was implemented.

Nonresident sheep hunters would lose the guarantee to be able to hunt Dall sheep in parts of Region III, and would have to take their chances with a draw-only hunt.

**7. List any other solutions you considered and why you rejected them.**  
 Waiting for the DNR proposed Guide Concession Program to be implemented.

Rejected because we have already waited too long for this proposed concession program to be implemented, and it now appears it will never come about.

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Only trying to "fix" the known problem areas in Region III, not making all of Region III draw-only for nonresident sheep hunters.

Rejected for rationale stated in the proposal.

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Including Region III registration sheep hunts for residents in all general (non-draw) open season areas, mandatory harvest reporting period, ADFG discretionary authority to close some sheep hunts based on harvest reports, in conjunction with our proposed solution.

Rejected because we don't believe we need that at this time, but our concern is to

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